

EXHIBIT D

Megan Bennett

From: Shen, Andrew C. <ashen@kellogghansen.com>
Sent: Monday, May 03, 2021 11:27 AM
To: Steven R. Pounian; Kellogg, Michael K.; Rapawy, Gregory G.; Huppert, Matthew R.
Cc: Jim Kreindler; Andrew J. Maloney; Megan Bennett; SCarter1@cozen.com; zScott Tarbutton; zJodi W. Flowers; zRobert Haefele; Goldman, Jerry; Strong, Bruce; John Fawcett; Lisa Ranieri; Debra Pagan; 'Cashon, Richard'
Subject: RE: Bayoumi, Jarrah, and Thumairy depositions

Steve:

Mr. Bayoumi is available on June 9, 10, and 11. Mr. Jarrah is available on June 17 and 18. Mr. Thumairy is available on June 28, 29, and 30. We believe that 10.5 hours is more than sufficient to complete each of these depositions. Nonetheless, we will agree to your request for three days for Mr. Bayoumi's and Mr. Thumairy's depositions, provided that Plaintiffs' questioning will not exceed a total of 14 hours for each of these two witnesses. All three witnesses will testify in Arabic.

Regards,

Andy

Andrew C. Shen
Kellogg, Hansen, Todd, Figel & Frederick P.L.L.C.
1615 M Street, N.W.
Suite 400
Washington, D.C. 20036
Direct: (202) 326-7963
Fax: (202) 326-7999

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From: Steven R. Pounian <Spounian@kreindler.com>
Sent: Friday, April 30, 2021 3:22 PM
To: Shen, Andrew C. <ashen@kellogghansen.com>; Kellogg, Michael K. <mkellogg@kellogghansen.com>; Rapawy, Gregory G. <grapawy@kellogghansen.com>; Huppert, Matthew R. <mhuppert@kellogghansen.com>
Cc: Kreindler, James <jkreindler@kreindler.com>; Maloney, III, Andrew <amaloneyn@kreindler.com>; Megan Bennett <Mbenett@kreindler.com>; SCarter1@cozen.com; Tarbutton, Joseph <starbutton@cozen.com>; zJodi W. Flowers <jflowers@motleyrice.com>; zRobert Haefele <rhaefele@motleyrice.com>; Goldman, Jerry <jgoldman@andersonkill.com>; Strong, Bruce <Bstrong@andersonkill.com>; John Fawcett <Jfawcett@kreindler.com>; Lisa Ranieri <LRanieri@kreindler.com>; Debra Pagan <dpagan@kreindler.com>; 'Cashon, Richard' <rcashon@motleyrice.com>
Subject: [EXTERNAL] Bayoumi, Jarrah, and Thumairy depositions

Dear Andy,

Plaintiffs will conduct the remote depositions of the following witnesses starting on the dates listed:

- Omar al Bayoumi - Thurs June 10
- Musaed al Jarrah - Thurs June 17
- Fahad al Thumairy - Mon June 28

As we have previously stated, we propose an extension of the time limits for the depositions of Bayoumi and Thumairy. If the witnesses testifying in Arabic, we expect to need three days of testimony from Bayoumi and Thumairy. We also expect that the Jarrah deposition will require two days.

Please confirm these dates so that we can prepare and finalize the necessary arrangements.

Regards,

Steve

Steven R. Pounian

Of Counsel



Kreindler & Kreindler LLP

485 Lexington Ave
New York, NY 10017

T: 212.973.3477 · E-mail: spounian@kreindler.com
F: 212.972.9432 · Web: www.kreindler.com

Please note our new address effective March 26, 2021. Phone and fax numbers remain the same.

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